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FDA Commisioner Jane Henney
U. S. Food and Drug Administration
Dockets Branch
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 99N-4282
Labeling of Genetically-Engineered Food Products

Ms. Jane Henney:

I am writing to express my dissatisfaction with the FDA's failure to require labeling of genetically-engineered food. I am very concerned about the rapid assimilation of genetically-engineered products into the American food supply without benefit of consumer comment, and lack of any requirement to ascertain its safety to human health and/or potential consequence to the environment.

According to the September 1999 issue of Consumer Reports magazine, genetically-engineered foods, particularly those made of corn and soybeans, are abundant in the U.S. marketplace. These include food products found in most home kitchens, from cornbread mixes to tortilla chips, as well as infant formulas, fresh tomatoes, tofu, and hamburger patty substitutes. Indeed, the agriculture industry has experienced phenomenal growth in the production of genetically-engineered crops. According to the September 13, 1999 issue of Newsweek magazine, of the total corn crop in 1996, 4.6 percent was grown from genetically-altered seed. In 1998, the percent increased to 40.1 percent. Genetically-modified soybeans now constitute 44.8 percent of the total soybean crop, up from just 7.2 percent just two years ago. Today, one-fourth of U.S. cropland is covered with genetically-engineered crops, and the acreage devoted to genetically-modified crops is expected to increase.

The safety of such agriculture practices has yet to be proven. Recent studies by John Obrycki and Laura Hansen, entomologists at Iowa State University, have shown that corn pollen from genetically-engineered corn containing the Bt gene is a threat to monarch butterfly larvae. Additionally, the widespread use of Bt-engineered crops will accelerate the eventual genetic resistance of the pests that Bt is intended to destroy. Furthermore, genetic scientists cannot control where a gene is inserted or how many copies are inserted, so the possibility of creating undesirable outcomes is very real. Lastly, the argument that genetic engineering is just a step beyond plant hybridization is untrue. Hybridization of plants involves crossing plants with plants

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from the same or related species. Genetic engineering involves crosses of unlike organisms that would not occur in nature. For example, I recently learned that flounder was crossed with strawberry to improve the cold storage of strawberries. Without labeling, how would a consumer allergic to fish avoid fish-tainted strawberries?

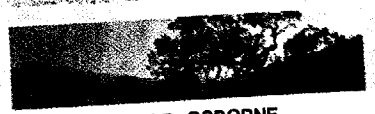
Because there is evidence that genetically-engineered crops can interfere with environmental processes, as well as affect the nutritional composition and the allergen potential of food, I believe the FDA should fund rigorous studies to assess the long-term environmental and heath consequences from genetically-engineered crops.

As a consumer, it is my right to make informed purchasing decisions about the foods that I consume. Therefore, it is my belief that all foods intended for human consumption made from genetically-modified crops be labeled as such. This includes fresh, frozen, and canned produce, grains and grain-based products, as well as meat and dairy products if the feed consumed by animals is derived from genetically-modified materials. Labeling of food products should be mandatory, not voluntary, and should list the organisms being crossed to minimize allergic reactions. Additionally, if genetically-engineered seed poses a threat to human health or causes environmental harm, it should be withdrawn immediately from the marketplace.

Sincerely,

K. Osborne

Kim P. Osborne



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